# Proposed Amendment: Tables of Maximum Incremental Reactivity (MIR) Values

Reactivity Research Advisory Committee
August 28, 2007
Sacramento, California

**California Environmental Protection Agency** 



**Air Resources Board** 

## Aerosol Coating Products Regulation

- 2000: Board approved amendments to the Aerosol Coating Products Regulation
- Also approved new subchapter with MIR values
- Reactivity limits (effective 2001) for 36 coating categories based on MIR scale

#### Board Directive to Executive Officer

- Review MIR values every 18 months
  - Revise if necessary
- Amendments to update MIR values, conducted thru Exec. Officer public hearing

## Using the MIR Values

- MIR values (2000) used to calculate Product-Weighted MIR (PWMIR) values for aerosol coatings
- MIR values for aerosol coatings unchanged until June 1, 2007
- Only the MIR values for new compounds added to the existing tables can be used in aerosol coatings prior to June 1, 2007

#### 2000 Tables of MIR Values

Based on earlier work by Dr. Carter (UCR)

- Section 94700: MIR values for almost 700 individual VOCs or mixtures
- Section 94701: MIR values for 24 classes of hydrocarbon solvents

#### 2003 Tables of MIR Values

Based on work reported by Dr. Carter in 2002

- Section 94700: MIR values for almost 800 individual VOCs or mixtures
- Section 94701: MIR values for 24 classes of hydrocarbon solvents (unchanged)

#### MIRs, Sec 94700: 2003 vs 2000

- 102 new compounds with MIR values added to Section 94700 of CCR
- 14 existing VOCs: updated MIR values
  - MIR values changed by > 5%
- No changes to Section 94701

## Why Amend MIR Values?

- Board resolution: review tables every 18 months
- Last amended in December 2003
- Regulations should be based on "best science"
- Dr. Carter's research: significant change for some MIR values due to new SAPRC-07 mechanism
- Hundreds of VOCs added to SAPRC mechanism, and also MIR tabulation

## Section 94700 & 94701 Changes

- Add hundreds of new VOCs or mixtures
- Continued use of Upper Limit Estimates
- Revised column for MIR value
- Review of bin values for hydrocarbon solvents
  - New solvents
  - Impacts of new MIR values on bin system

## Scientific Basis for the Proposal

- Dr. Carter's review of MIR values
  - >1500 experiments
  - Major revision of the chemical mechanism (from SAPRC-99 to SAPRC-07)
  - Additions/changes: chlorine chemistry,
     aromatic mechanisms, PM prediction
  - Explicit mechanisms for >700 VOC types

## Scientific Basis for the Proposal

(Continued)

- Hundreds of VOCs or mixtures added;
   now ~1100 VOCs or mixtures. More?
  - Overall, MIR values changed by ~10%
  - But, 35 VOCs changed by >35%
  - And, 5 VOCs changed by a factor of 2

#### Scientific Reviews

- Research Screening Committee approved Dr.
   Carter's draft final report (SAPRC-07)
- Contracts to evaluate SAPRC-07, by independent distinguished scientists
- Reactivity Scientific Advisory Committee will review scientific basis of the proposal

## **Environmental Impacts**

- California Environmental Quality Act (CEQA) requires evaluation of impacts
  - Particulate Matter (PM)
  - Global Warming
  - Stratospheric Ozone Depletion
  - Water Quality & Landfill Loading
  - Increased Use of Toxics
  - Tropospheric Ozone Concentrations

## **Economic and Other Impacts**

- Evaluate economic impacts on existing products
- Other reactivity-based regulations
  - Low-Emission Vehicle/Clean Fuel regulation
  - Future reactivity-based regulations for other source categories
- Environmental Justice

#### Time-Line

- Dr. Carter's Report & RRAC meeting today
- Additional VOCs? due September 14
- Peer Review of SAPRC-07 Mechanism,
   Reactivity Scientific Advisory Committee review,
   and Final MIR Values December 2007
- ARB Staff's Draft Proposal early 2008
- ARB Staff Report March 2008
- ARB Governing Board hearing June 2008
  - with hearing for consumer product regulation

#### Summary

- Board requirement to periodically review reactivity-based regulations
- Dr. Carter's review shows the need for significant changes
- June 2008 Board Hearing for proposed amendments to tables of MIR values; coordinated with consumer product regulatory review

#### Reminder

If you suggest candidates by September 14, Dr. Carter may develop MIR values for:

- Additional VOCs?
- New solvents?

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